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March 14, 2022

VIA ECF

The Honorable Lorna G. Schofield
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

The application is **GRANTED**. The stay in this action is lifted. The parties shall appear for a conference on **March 30, 2022, at 4:30 p.m.**, on the following conference line: 888-363-4749, access code: 558-3333. By **March 23, 2022**, the parties shall jointly file a letter proposing next steps in this action.

Dated: March 15, 2022
New York, New York

LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

RE: *Gotham Diversified Neutral Master Fund, LP et al v. Chicago Bridge & Iron Company N.V. et al*; Docket No. 1:18-cv-09927 (consolidated)

Dear Judge Schofield:

This firm represents the Plaintiffs in the above-captioned consolidated actions (the “Direct Actions”). All discovery and other proceedings in the Direct Actions have been stayed since October 2019 (the “Stay of Proceedings”), with the Court having issued an order, at the parties’ request, continuing that stay “pending the completion of the liability phase of the related class action (17 Civ. 1580)” (the “Class Action”) on September 30, 2021. On February 4, 2022, plaintiffs in the Class Action filed a motion for preliminary approval of their proposed Settlement Agreement with Defendants. (ECF No. 421). In light of the settlement reached, the Class Action will not be moving forward to the trial through which the Direct Actions are presently stayed. As such, we write to respectfully request that the Stay of Proceedings be lifted and that the Court set a status conference in the Direct Actions to discuss a case schedule moving forward. Defendants have been consulted and do not object to this request. The parties are generally available the week of March 21, 2022 for such a conference.

We thank the Court for its attention to this matter.

Respectfully submitted,

/s/ Brandon Fierro

Brandon Fierro

cc: All Counsel of Record (via ECF)